

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

IN RE: FLINT WATER CASES

Case No. 5:16-cv-10444-JEL-MKM
Hon. Judith E. Levy, District Judge

This Document Relates To:
BELLWETHER III

Case No. 5:17-cv-10164-JEL-KGA

**DEFENDANTS VEOLIA NORTH AMERICA, LLC, VEOLIA NORTH
AMERICA, INC., AND VEOLIA WATER NORTH AMERICA
OPERATING SERVICES, LLC'S MOTION FOR LEAVE TO FILE
SUPPLEMENTAL DECLARATION IN SUPPORT OF MOTION TO
EXCLUDE OPINIONS AND TESTIMONY OF DR. AARON SPECHT**

Defendants Veolia North America, LLC, Veolia North America, Inc., and Veolia Water North America Operating Services, LLC (VNA) move for leave to file a short supplemental declaration from Dr. William Huber in support of their Motion to Exclude Opinions and Testimony of Dr. Aaron Specht (ECF No. 2916). *See* Aug. 14, 2024 Suppl. Decl. of William A. Huber, Ph.D. (Suppl. Dec.).

At the August 7 *Daubert* hearing, Plaintiffs argued that [REDACTED]

[REDACTED]
[REDACTED]

[REDACTED]. VNA seeks leave to submit Dr. Huber's supplemental declaration to respond to Plaintiffs' new argument.

As Dr. Huber's declaration explains, [REDACTED]
[REDACTED]

A series of eight horizontal black bars of varying lengths, decreasing from top to bottom. The first bar is the longest, followed by a shorter one, then a very long one, then another short one, then a medium-length one, then two more short ones, and finally the shortest bar at the bottom.

The Court should grant leave to file Dr. Huber's supplemental declaration and exclude Dr. Specht's opinions.

As Local Rule 7.1 requires, on August 13, 2024, VNA sent counsel for Plaintiffs an email identifying the points raised in this motion. Plaintiffs responded that they object to and intend to oppose the motion.

Respectfully submitted,

**CAMPBELL, CONROY
& O'NEIL P.C.**

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Veolia Water North America Operating Services, LLC*

Dated: August 14, 2024

CERTIFICATE OF SERVICE

I hereby certify that August 14, 2024, I electronically filed the foregoing document with the Clerk of the Court using the ECF System, which will send notification to the ECF counsel of record.

Respectfully submitted,

/s/ James M. Campbell

Dated: August 14, 2024